

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

In re:

Jennifer Leigh Gallagher,

Debtor.

621 SE Shiloh Drive  
Lee's Summit MO 64063  
SSN: xxx-xx-9621

Case No.: 20-40478-drd13

**OBJECTION TO CLAIM 4-1 – U.S. BANK TRUST NATIONAL ASSOCIATION AS  
TRUSTEE OF THE TIKI SERIES III TRUST**

COMES NOW Movant Jennifer Leigh Gallagher and hereby objects to the Proof of Claim filed by Creditor U.S. Bank Trust National Association as Trustee of the Tiki Series III Trust in the amount of \$152,777.45, filed on April 24, 2020. The court claim number is 4-1.

**Your claim may be reduced, modified, or eliminated. You should read this document carefully and discuss it with your attorney, if you have one.**

Pursuant to Local Rule 3007-1 (C), the Claimant shall have 30 days after service of the Objection in which to file a Response, if you do not want the court to eliminate or change your claim. The Response shall be in writing and state why the claim should be allowed as filed. If a Response is filed, the Court will schedule a hearing. If no timely Response is filed, the Court will enter an Order sustaining the Objection to the Claim. Parties not represented by an attorney shall mail a Response to the Court at the address below. Debtor(s) not represented by an attorney must be served a copy of the Response by regular mail. If your Response is mailed, it must be early enough so that the court will receive it on or before 30 days after service of the Objection.

The basis for the objection is as follows: (PLEASE CHECK ONLY THE APPLICABLE BOXES)

- ☐ The deadline for filing proofs of claim expired prior to the filing of the claim, so the claim should be disallowed in its entirety. (Not applicable in Chapter 7)
- ☐ The claim should be disallowed entirely because the Proof of Claim
- ☐ The claim should instead be allowed as a (☐secured, ☐priority, or ☐unsecured) claim in the amount of \$Enter amount because Enter reason.

☒ The claim should instead be allowed as secured in the amount already paid by the Chapter 13 Trustee and any remaining claim disallowed. The Real Property subject to this Claim was sold and the Creditor was paid in full at closing.

☐ Other Enter text:

Dated: 6/14/2021

THE SADER LAW FIRM

By: /s/ Bradley D. McCormack

Bradley D. McCormack, MO 54338

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Kansas City, Missouri 64108

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### **CERTIFICATE OF SERVICE**

I, Bradley D. McCormack, hereby certify that a true and correct copy of the Objection to Claim was mailed to affected creditors by first class mail and U.S. Certified Mail Return Receipt Requested this 14<sup>th</sup> day of June, 2021.

SN Servicing Corporation  
323 5<sup>th</sup> Street  
Eureka, California 95501

Ghidotti Berger, LLP  
Attn: Ms. Michelle Ghidotti-Gonsalves  
1920 Old Tustin Avenue  
Santa Ana, California 92705

Dated: 6/14/2021

By: /s/ Bradley D. McCormack

Bradley D. McCormack

**Court address: U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106**  
**Instructions:**

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